

5. Illicit Discharge Elimination Program BMPs

5.1. Overview

This chapter describes the illicit discharge elimination program BMPs implemented by MDOT, and any changes that have occurred with this program during the reporting period. Complete information on MDOT's illicit discharge elimination program BMPs is included in the Storm Water Management Plan (SWMP). The organization of this chapter is as follows:

- Section 5.2. describes the status of implementation of the BMPs that were described in the SWMP.
- Section 5.3. contains the schedule for further implementation of the BMPs.

5.2. BMP Status and Measurable Goals

Each of the following sections will discuss the status of the BMPs identified and described in the SWMP and the measurable goals that were obtained over the reporting period.

5.2.1. Dry Weather Field Screening

The presence of flow in storm water systems when it has not rained more than one tenth of an inch in 72 hours, may be an indicator that there is an illicit discharge or connection. As the presence of dry weather flow is such a valuable indicator, all initial field screening will be conducted during dry weather flow conditions.

A consultant contractor working for MDOT completed an extensive dry weather screening program for all outfalls located in the five Phase I communities in this reporting period. To date, 95 percent of the Phase I IDEP work is complete. A total of 366 outfalls have been identified with the discovery of only 16 potential problems. Of those 16, only 5 illicit connections and 3 illicit discharges were found to be directly discharging to the MDOT storm sewer system. The remaining 8 illicit connections found were connected to a municipal system, which was connected to the MDOT system. Hence, approximately 1 percent (5 out of 366) of MDOT's outfalls have been identified with possible illicit connections directly discharging to the MDOT system. The 3 illicit discharges identified were typically car-washing activities resulting in overland flow to a nearby catch basin. In our opinion illicit discharges of this nature are best addressed through public education and not an IDEP program. Table 5-1 summarizes the results by community. A summary of results and measurable goals can be seen in Chapter 10 for each Phase I community. Subsequent reports will focus on internal training efforts.

Table 5-1 Results of Dry Weather Field Screening for MDOT Phase I Communities

Community	No. of Outfalls	% of Field Work Completed	No. of Illicit Connections Found to a MDOT Storm Drain	No. of Illicit Connection Found to Municipal Storm Drain	No. of Suspected Illicit Discharges to MDOT ROW
Ann Arbor	45	100%	0	1	0
Flint	96	84%	4	1	1
Grand Rapids	107	97%	0	0	1
Livonia	28	100%	0	0	0
Sterling Heights	39	100%	0	0	0
Warren	51	100%	3	5	1
Total	366	95%	7	7	3

5.2.2. Follow-Up Identification and Elimination Program

MDOT has undertaken a program to identify and correct the source of any illicit discharges or connections that were identified during the field screening process for the five Phase I communities. This program was performed and completed by a consultant contractor working for MDOT on the five original Phase I communities in Michigan a month after this reporting period. A summary of the results and measurable goals of this program are presented in Chapter 10 for each Phase I community. This program will not be performed again unless warranted, future reports will focus on internal training efforts.

5.2.3. Preventing Future Illicit Connections and Discharges

The most important task in preventing or minimizing future illicit connections and discharges is public and internal education programs, guidance, and policies. Chapter 3 of this document describes MDOT's public and internal education efforts.

MDOT formed a focus group to work on legal requirements to prevent future sewer tap-ins or cross connections into MDOT's storm sewer system. The following is a brief description of the work accomplished by this group over the reporting period.

In order to update requirements to prevent future illicit connections, MDOT is presently working on compiling drainage information now included in many separate manuals into one design manual to be used on all MDOT projects. This manual will contain specific criteria for the identification and elimination of any existing cross-connections between sanitary and storm sewer systems, and the prevention of future cross-connections.

Changes are also currently being made to Sections 14.01 and 14.02 of MDOT's Construction Permit Manual in an effort to update MDOT's current tap-in process. These changes include:

- Language addressing water quality will be added to Section 8 of the general conditions.

- The checklist in section 14.02 will be changed to reflect water quality.
- The certification in section 14.02 will incorporate water quality concepts.

While these changes are being made, MDOT is also examining legal methods and options for notification of permit changes. MDOT has also begun development of a new description of the permit process. This new description has been formulated as a rough draft and needs to go through a final approval process. After these tasks have been completed, the focus group will work to identify changes in data entry and reporting.

In order to evaluate how effective this program is, several measurable goals have been established. The results of the measurable goals are included below in Table 5-2.

Table 5-2 Preventing Future Illicit Connections and Discharges Measurable Goals

Measurable Goals	Type	Results
Report status of the changes on the Construction Permit Manual	Revisions are currently being checked	NA
Report status on the development of a new description of the permit process	A rough draft of the new description of the permit process has been completed.	NA

5.3. Implementation Schedule

MDOT will continue to implement these BMPs and will begin work consistent with the new MDOT Storm Water Management Plan for the Phase I communities. The following Table 5-3 is an estimated implementation schedule for all of the actions needed to fulfill the BMPs discussed in this chapter for illicit discharge elimination program.

Table 5-3 Implementation Schedule for Illicit Discharge Elimination Program BMPs

ID No.	Action	Completed for Phase I Communities	Year of Implementation			
			2002	2003	2004	2005
5.2.1	Dry Weather Field Screening					
	Complete initial screening of outfalls	X				
5.2.2	Follow-Up Identification and Elimination Program					
	Follow-up Investigation	X				
5.2.3	Preventing Future Illicit Connections and Eliminations					
	Completion of the Drainage Design Manual		X	X		
	Update MDOT’s Construction Permit Manual		X	X		
	Examine legal methods and options for notification of permit changes		X	X		
	Choose appropriate legal methods and options		X	X		
	Identify changes in data entry and reporting		X	X		
	Implement changes in data entry and reporting		X	X		
	Develop new description of permit process		X	X		
	Distribute new description of permit process		X	X		